

Serial No. 09/549,236

Appeal Brief

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PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Kevin W. Carley

Serial No.: 09/549,236

Filing Date: April 13, 2000

Title: ERROR AND LOAD SUMMARY
IN A HEALTH CARE SOLUTION
ENVIRONMENT

Group Art Unit: 3626

Examiner: Morgan, Robert W.

Docket No: 60021-340501

Mail Stop Appeal Brief - Patents
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Janet Byrne

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

APPELLANT'S APPEAL BRIEF

Dear Sir:

In response to the Office Action made final dated October 27, 2005 and Advisory Action dated January 26, 2006, issued by Examiner Robert W. Morgan, Appellant submits this Appeal Brief appealing the rejections of Examiner Morgan.

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(1) REAL PARTY IN INTEREST

The present application was originally assigned to Andersen Consulting LLP, which subsequently changed its name to Accenture LLP.

(2) RELATED APPEALS AND INTERFERENCES

There are no appeals or interferences related to the present case.

(3) STATUS OF CLAIMS

Claims 19-33 are pending and are herein appealed.

Claims 19, 21, 24, 26, 29 and 31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Buchanan*, U.S. Patent No. 5, 267,155; in view of *Edwards et al.*, U.S. Patent No. 5,410,551; in view of *Hobbs*, U.S. Patent No. 6,523,022; in view of *Lee*, U.S. Patent No. 6,535,883.

Claims 20, 22-23, 25, 27-28, 30, and 32-33 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Buchanan*, U.S. Patent No. 5, 267,155; in view of *Edwards et al.*, U.S. Patent No. 5,410,551; in view of *Hobbs*, U.S. Patent No. 6,523,022; in view of *Dauerer et al.*, U.S. Patent No. 5,410,576.

(4) STATUS OF AMENDMENTS

There are no outstanding amendments to the claims.

(5) SUMMARY OF CLAIMED SUBJECT MATTER

The present invention generally relates to the generation of error and summary reports for a data load from a plurality of user data files across multiple user stations within a network. The various claims are directed toward a method, system, and a computer program on a computer readable medium, wherein the general improvements over the prior art include, *inter alia*, selecting data files based on keywords arranged in a tier structure; employing a data management template to organize data files associated with selected keywords, validating the data load, and providing an error report related to the data load.

More specifically, Appellant's claims 19, 24, and 29 recite a method, system, and computer program embodied on a computer readable medium for generating error and summary reports for a data load, while storing user input files in a multi-tier client/server architecture such that the data files are organized around tiers of keywords, comprising the steps of:

(a) maintaining a connection between multiple user stations and a server having a database (*see* Specification at 25:22-28); (b) selecting a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file and a data type, also wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database (*see* Specification at 23:15-16; 24:18-20; 25:28-30; 29:8-9); (c) receiving from one of the user stations a plurality of user input data files that are associated to the selected plurality of keywords (*see* Specification at 25:28-29; 28:16-17; 29:7-9); (d) selecting a data management template corresponding to the keywords, wherein the data management template organizes the data files to be loaded into the database (*see* Specification at 25:31-26:6; 28:18-19; 29:10-11); (e) validating that all data to be loaded into the database match the data management template by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required default, default field, sequence number and hard-coded field checks are met (*see* Specification at 26:6-7; 28:19-21; 29:11-13); (f) loading the validated data into the database (*see* Specification at 26:7-9; 28:21-23; 29:13-14); and (g) compiling a report identifying data that match the data management template

and data that do not match the data management template (*see* Specification at 26:13-15; 28:23-24; 29:18-19).

Claims 20, 25, and 30 recite a method, system, and computer program wherein no data are loaded into the database if any of the data does not match the data management template (*see* Specification at 26:17-18; 29:1-2; 29:21-23).

Claims 21, 26, and 31 recite a method, system, and computer program wherein the user input data files are medical files (*see* Specification at 26:24; 28:17; 29:9-10).

Claims 22, 27, and 32 recite a method, system, and computer program further comprising the steps of separating data that match the data management template from data that do not match the data management template, and sending the data that do not match the data management template to the user station (*see* Specification at 26:11-13; 28:26-29; 29:16-19).

Claims 23, 28, and 33 recite a method, system, and computer program further comprising the step sending a notification upon detecting a concurrently executing load process (*see* Specification at 26:25-26; 28:13-14; 29:24-25).

(6) GROUND OF REJECTION TO BE REVIEWED ON APPEAL

The Examiner rejected claims 19, 21, 24, 26, 29 and 31 under 35 U.S.C. § 103(a) as being unpatentable over *Buchanan*, U.S. Patent No. 5,267,155; in view of *Edwards et al.*, U.S. Patent No. 5,410,551; in view of *Hobbs*, U.S. Patent No. 6,523,022; in view of *Lee*, U.S. Patent No. 6,535,883. In making this obviousness rejection, has the Examiner established a *prima facie* case of obviousness?

The Examiner rejected claims 20, 22-23, 25, 27-28, 30, and 32-33 under 35 U.S.C. § 103(a) as being unpatentable over *Buchanan*, U.S. Patent No. 5,267,155; in view of *Edwards et al.*, U.S. Patent No. 5,410,551; in view of *Hobbs*, U.S. Patent No. 6,523,022; in view of *Dauerer et al.*, U.S. Patent No. 5,410,576. In making this obviousness rejection, has the Examiner established a *prima facie* case of obviousness?

(7) ARGUMENT

A. *Background*

Appellant filed the original application on April 13, 2000. The first substantive Office action addressing the merits of patentability was mailed October 8, 2002, wherein Examiner Morgan rejected then pending claims 1-18 pursuant to 35 U.S.C. § 103(a).

On March 10, 2003, Appellant responded to the Office action, amending the specification, amending the title, and adding claims 19-33. Appellant additionally presented detailed arguments regarding the differences between the invention and the cited references.

On June 18, 2003, Examiner Morgan issued an Office action made final rejecting claims 1-33 pursuant to 35 U.S.C. § 103(a) on the same cited prior art, and §§ 112 ¶ 1; 132.

On August 19, 2003, Appellant filed an Amendment After Final, canceling claims 1-18 and amending the claims to overcome the rejections. Appellant additionally presented detailed arguments regarding the differences between the invention and the cited references, and addressed the new matter rejection.

On September 12, 2003, Examiner Morgan issued an Advisory Action, noting the arguments and amendment failed to place the claims in condition for allowance, and did not enter the amendments for purposes of appeal.

On November 17, 2003, Appellant filed a Request for Continued Examination, and requested consideration of an enclosed amendment. The enclosed amendment provided the same amendment and argument initially submitted August 19, 2003.

On February 24, 2004, Examiner Morgan issued an Office action rejecting claims 19-33 pursuant to 35 U.S.C. § 103(a), and the rejections pursuant to 35 U.S.C. §§ 112 ¶ 1; 132 were withdrawn.

On May 24, 2004, Appellant filed an Amendment that presented detailed arguments regarding the differences between the invention and the cited references.

On August 26, 2004, Examiner Morgan issued an Office action made final rejecting claims 19-33 pursuant to 35 U.S.C. § 103(a).

On October 26, 2004, Appellant filed an Amendment after final and amended the claims. Appellant additionally presented detailed arguments regarding the differences between the invention and the cited references.

On November 30, 2004, Examiner Morgan issued an Advisory Action, noting the arguments and amendment failed to place the claims in condition for allowance, and did not enter the amendments for purposes of appeal.

On December 17, 2004, Appellant filed a Request for Continued Examination, and requested consideration of the amendment previously filed October 26, 2004.

On April 7, 2005, Examiner Morgan issued an Office action rejecting claims 19-33 pursuant to 35 U.S.C. § 103(a).

On July 1, 2005, Appellant filed an Amendment, amending claims 19-33. Appellant additionally presented detailed arguments regarding the differences between the invention and the cited references.

On October 27, 2005, Examiner Morgan issued an Office action made final, rejecting claims 19-33 pursuant to 35 U.S.C. § 103(a).

On December 27, 2005, Appellant filed an Amendment after final, presenting detailed arguments regarding the differences between the invention and the cited references.

On January 26, 2006, Examiner Morgan issued an Advisory Action, entering the proposed remarks of Appellant but continuing to reject claims 19-33.

In response, Appellant filed a Notice of Appeal, which was received by the Office on March 1, 2006.¹ Each of Examiner Morgan's rejections will be addressed below.

¹ The Notice of Appeal erroneously identified the appeal of claims 19-23, 25, and 31, and did not address the remaining claims. As there is no requirement that an Appellant identify the specific claims appealed, *see* 37 C.F.R. § 41.31; MPEP 1204(I), Appellant herein addresses all claims.

B. *The Rejection Of Claims Pursuant To 35 U.S.C. § 103 Is Improper.*

1. **Independent claims 19, 24, and 29 are nonobvious.**

Claims 19, 24, and 29 have been rejected pursuant to 35 U.S.C. § 103(a) by application of *Buchanan*, U.S. Patent No. 5,267,155; in view of *Edwards et al.*, U.S. Patent No. 5,410,551; in view of *Hobbs*, U.S. Patent No. 6,523,022; in view of *Lee*, U.S. Patent No. 6,535,883. The cited prior art fails to teach or suggest all limitations of the claimed invention, and, therefore, cannot and does not make the present invention obvious. Appellant respectfully requests that the Office rejections pursuant to 35 U.S.C. § 103(a) be reversed and a Notice of Allowability be issued.

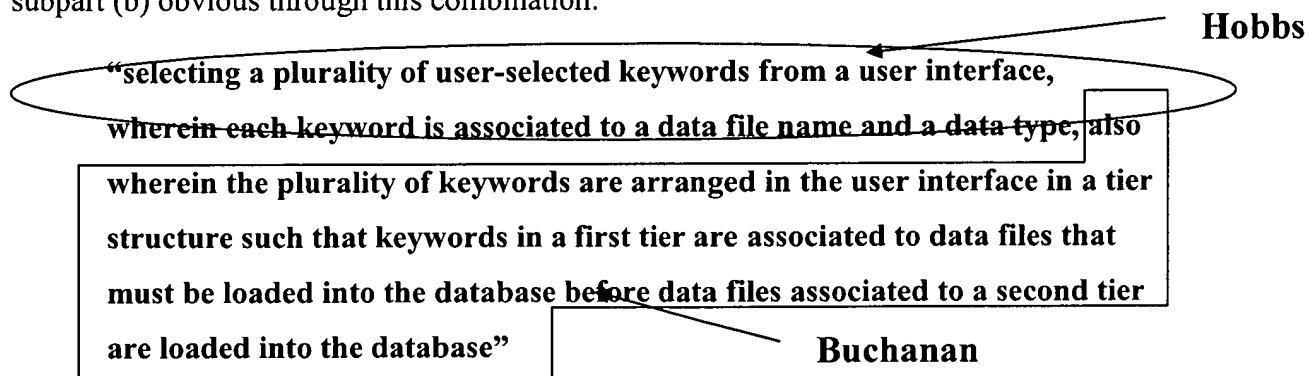
The present invention generally provides for generating error and summary reports for a data load, while storing user input data files in a multi-tier client/server architecture such that the data files are organized around tiers of key words, comprising the steps of:

- (a) maintaining a connection between multiple user stations and a server having a database;
- (b) selecting a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type, also wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database;
- (c) receiving from one of the user stations a plurality of user input data files that are associated to the selected plurality of keywords;
- (d) selecting a data management template corresponding to the keywords, wherein the data management template organizes the data files to be loaded into the database;
- (e) validating that all data to be loaded into the database match the data management template by enforcing business rules/requirements and ensuring that referential

integrity, codedependency, primary key, required field, default field, sequence number, and hard-coded field checks are met;

- (f) loading the validated data into the database; and,
- (g) compiling a report identifying data that match the data management template and data that do not match the data management template.

(See Claims Appendix (claims 19, 24, 29).) The Office asserts that the limitation of subpart (b), regarding the use of user-selected keywords, arrangement of keywords in the user interface, and combination of those elements is obvious in view of *Buchanan* and *Hobbs*. (See Advisory Action 01/26/06 at 2-5.) Generally, the office asserts that *Buchanan* in view of *Hobbs* makes subpart (b) obvious through this combination:



(Response to Office Action 12/27/05 at 6.) This rejection, however, is unsupported by *Buchanan* in view of *Hobbs*, and a *prima facie* case of obviousness has not been established, because: (1) in applying *Hobbs* consideration has not been placed on the invention as a whole; (2) the application of *Buchanan* is unavailing because it fails to even consider the arrangement of data files via keyword hierarchy; and (3) there is no motivation to combine the references.

- (a) **Application of *Hobbs* demonstrates a failure to consider the claimed invention as a whole.**

It is well settled that in evaluating whether a claimed invention is obvious under 35 U.S.C. § 103(a), "the claimed invention must be considered as a whole." MPEP § 2141(II) (citing *Hodash v. Block Drug Co., Inc.*, 786 F.2d 1136, 1143 n.5 (Fed. Cir. 1986)). Thus, "[t]o

establish *prima facie* obviousness of a claimed invention, *all* the claim limitations must be taught or suggested by the prior art.” MPEP § 2143.03 (citing *In re Royka*, 490 F.2d 980, 180 U.S.P.Q. 580 (CCPA 1974)) (emphasis added). “*All words in a claim must be considered in judging the patentability of that claim against the prior art.*” *Id.* (quoting *In re Wilson*, 424 F.2d 1382, 1835, 165 U.S.P.Q. 494, 496 (CCPA 1970)) (emphasis added). Because a claim is obvious in light of the prior art only if all claim language is considered, see *id.*, obviousness cannot be established through consideration of only selected portions of a claim that allegedly correspond to the prior art.

The Office’s rejection premised on *Hobbs* fails to establish the obviousness of the claimed invention because *Hobbs* simply does not disclose the portion of cited claim on which the Examiner relies. Specifically, *Hobbs* is cited as disclosing the first phrase and wherein clause of element (b): “selecting a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type”. (See Office Action 10/27/05 at 5 (citing *Hobbs* 17:17-54).) Further, the Office states that:

The Examiner respectfully submits that the claim language recites, “selecting a plurality of user-selected keywords from a user interface” and *Hobbs* teaches that the user clicks on a Linked Term, which are phrases (keywords) with assigned Argument Symbol, for example, AUTOMOTIVE-RELATED INDUSTRY is the phrase and “AR1” is the assigned Argument Symbol (see: column 17, lines 17-52, in particular, column 17, lines 33-36 and lines 52-54). Therefore, it is the user that clicks or selects the keywords or phrases at step 253 and the request including the Argument Symbol is passed to CGI application on the Application Server ... This clearly shows that the user selects keywords by clicking a phrase and meets Applicant’s claimed limitation.

(Advisory Action 01/26/06 at 2) (emphasis in original). Such argument and application fails to consider the full language of claim, and, thus, the claimed invention is not obvious. MPEP § 2143.03.

The Office applies *Hobbs* to the claimed invention’s “user-selected keywords” phrase of subpart (b) arguing “*user-selected*” is the same as described in *Hobbs* in which “the user selects keywords by clicking a phrase,” wherein the phrase in *Hobbs* is an identified phrase

corresponding to a preidentified argument symbol. (*Id.*) The Office does not consider the phrase “selecting a plurality”. Based on the syntax of the sentence, “the user-selected keywords” occurs temporally at an early point from the user’s “selecting a plurality” such that the user selects or identifies keywords that the user later selects when operating within the method of the invention. (*See* Claims Appendix (claim 19).) *Hobbs*, however, relates to the actual selection in the course of performing the claimed invention, and thus equating the disclosure of *Hobbs* to “user-selected keywords” is incorrect.

By the plain language of the claim, the activities described by the first “selecting” and second “user-selected” are temporarily distinct. The beginning “selecting” references the step occurring and described in the method, the “user-selected” referencing a selection by the user that occurred at a time before the first “selecting” occurs. Thus, as stated, application of *Hobbs* in the manner described by the Office is incorrect because *Hobbs* does not relate to previous identification of keywords by the user. *Hobbs*, if applicable, would relate to the activity of “selecting.” In that regard, the rejection is improper because it fails to consider the entirety of the claim language, and through its application fails to teach or suggest all elements of the claim language. *See* MPEP § 2141(II) (citing *Hodash v. Block Drug Co., Inc.*, 786 F.2d 1136, 1143 n.5 (Fed. Cir. 1986)); MPEP § 2143.03 (citing *In re Royka*, 490 F.2d 980, 180 U.S.P.Q. 580 (CCPA 1974)).

(b) Buchanan does not teach or suggest any portion of element (b).

To establish a *prima facie* case of obviousness, it is well-settled that the prior art reference (or references combined) must each or suggest *all* the claim limitations.” MPEP § 2142 (citing *In re Vaack*, 947 F.2d 488, 20 U.S.P.Q. 2d 1438 (Fed. Cir.1991)) (emphasis added). Here the claim language on which *Buchanan* is applied discloses that the “plurality of keywords are arranged in the user interference in a tier structure such that keywords in a first tier are associated to data files that must be loaded into a database before data files associated to a second tier are loaded into the database.” This language provides for a tier structure arrangement of the keywords corresponding to data files that is distinct from any associated to a data management template, as disclosed in subpart (d). (*See* Claims Appendix (claim 19).)

The Office's reliance on *Buchanan* is misplaced, and thus, *Buchanan* does not teach or suggest part of element (b), because the language of *Buchanan* addresses the section of multiple document templates to create a new document template. *Buchanan*, 13:60-14:7. In full context *Buchanan* discloses a function to create a new document template from "several previously defined document templates." *Buchanan*, 13:60-62. For example, it "may be desirable to generate a complete patient report including several separate reports." *Id.* at 13:63-64. To build the new document template, the user "can define the order in which each document template will appear in a multiple document template definition." *Id.* at 14:5-7. This language does not disclose any arrangement of keywords that are associated with data files such that data files associated with a first tier keyword are loaded before those associated with a second tier. Contrary to the assertion of the Office, endorsing this language as "clearly disclos[ing]" the data file load in a particular order, there is no such teaching. Display of the several document templates in a hierarchical structure does not require the loading of such data files in that order; the load could be accomplished in a different order with the same result. Moreover, an ordinary person skilled in the art would not interpret the language to disclose a corresponding load of data files in a certain hierarchy because the plain language addresses document templates, intended to organize a data load but not itself being loaded.

Buchanan's disclosure of generating a large document template by combining several smaller pre-existing document templates is not relevant to and neither teaches nor suggests a "data load" system that includes "error and summary reports," and in which the user selects a "plurality of user-selected keywords" wherein the keywords are "associated to a data file name and date type," and where the keywords "are arranged in the user interface" (GUI) "in a tier structure such that keywords in the first tier are associated to data files that must be loaded into the data base before data files associated to a second tier are loaded into the database." (Claims Appendix (claim 19).) Such disclosure would relate to the data management template, if at all, disclosed in subpart (d). According to *Buchanan*, a document template is not itself the data file that is loaded, but acts as a template into which specific "character strings" are loaded. See *Buchanan* at Abstract, 2:64-3:2; 4:43-50. To the extent any identification of data files occurs, it is the character strings disclosed in *Buchanan*. *Buchanan* does not teach or suggest the second

portion of subpart (b), and the rejection should be withdrawn. MPEP § 2142 (citing *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q. 2d 1438 (Fed. Cir.1991))

(c) A person skilled in the art would not combine *Hobbs* and *Buchanan*.

“In determining the propriety of the Patent Office case for obviousness in the first instance, it is necessary to ascertain whether or not the reference teachings would appear to be sufficient for one of ordinary skill in the relevant art having the reference before him to make the proposed substitution, combination, or other modification.” MPEP § 2143.01 (quoting *In re Linter*, 458 F.2d 1013, 1016, 173 U.S.P.Q. 560, 562 (CCPA 1972)). Cases in which a proper motivation to combine has been found illustrate that between the multiple references all elements of the claimed invention are disclosed. *See, e.g., In re Fulton*, 391 F.3d 1195, 1196-97, 73 U.S.P.Q.2d 1141, 1142 (Fed. Cir. 2004) (all elements of claimed invention existing in design patent and utility patent for a shoe sole with increased traction having hexagonal projections in a “facing orientation”); *Ruiz v. A.B. Chance Co.*, 357 F.3d 1270, 1276, 69 U.S.P.Q.2d 1686, 1690 (Fed. Cir. 2004) (separate utility patents disclosing similar inventions directed to solving the same problem of “underpinning slumping foundations.”) Thus, without all elements of the claimed invention disclosed in the combined references, the references could not provide any motivation for their combination. Nor could motivation be provided by the knowledge of one with ordinary skill in the art, as all elements are not present on which such motivation would operate.

The combination of *Hobbs* and *Buchanan* would not occur because their combination would not result in the claimed invention. *Hobbs* teaches how to append keyword arguments, such as “AR1” to CGI requests. *Hobbs*, 17:17-54. *Buchanan* teaches building a new document template by combining several pre-existing document templates. *Buchanan*, 13:60-14:10. Neither of these technologies would be reasonably combined because between the two they do not fully disclose the claimed invention, and the Office has not alleged other well-known knowledge in the art to complete the disclosure. Further, if the inventions were combined, the combined system would not enable a user to select “user-selected keywords from a user interface” where each of these user-selected keywords “is associated to a data file name and a data type”, and in which each of the user-selected keywords “are arranged in the user interact”

in a manner to show “a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database.” (Claims Appendix (claim 19).) Because all elements of the claimed invention are not disclosed, there is not motivation adequate for their combination. Accordingly, Appellant submits the claimed invention is nonobvious, and respectfully requests withdrawal of the rejection.

2. Dependent claims 20-23, 25-28, and 30-33 are nonobvious.

Claims 20-23, 25-28, and 30-33 depend from claims 19, 24, and 29, and are rejected through combinations of *Buchanan*, U.S. Patent No. 5,267,155; *Edwards et al.*, U.S. Patent No. 5,410,551; *Hobbs*, U.S. Patent No. 6,523,022; *Lee*, U.S. Patent No. 6,535,883; and *Dauerer et al.*, U.S. Patent No. 5,410,576. As demonstrated above, independent claims 19, 24, and 29 are nonobvious, and “[i]f an independent claim is nonobvious under 35 U.S.C. § 103(a), then any claim depending therefrom is nonobvious.” MPEP § 2143.03 (citing *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 494, 496 (CCPA 1970)). Therefore, because claims 20-23, 25-28, and 30-33 depend from independent claims 19, 24, and 29, they are also nonobvious. Appellant respectfully requests that the Office rejections pursuant to 35 U.S.C. § 103(a) be reversed and a Notice of Allowability be issued.

(8) CONCLUSION

Pending claims 19-33 remain rejected pursuant to 35 U.S.C. § 103(a). Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness, and requests that the Board of Patent Appeals and Interferences reverse the Examiner's decision.

Should any additional fees be necessary, the Commissioner is hereby authorized to charge or credit any such fees or overpayment to Deposit Account No. 50-1901 (Reference - 60021-340501).

Respectfully submitted,

By _____

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(A) CLAIMS APPENDIX

1. – 18. (Canceled)

19. (Previously presented) A method for generating error and summary reports for a data load, while storing user input data files in a multi-tier client/server architecture such that the data files are organized around tiers of keywords, comprising the steps of:

- (a) maintaining a connection between multiple user stations and a server having a database;
- (b) selecting a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type, also wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database;
- (c) receiving from one of the user stations a plurality of user input data files that are associated to the selected plurality of keywords;
- (d) selecting a data management template corresponding to the keywords, wherein the data management template organizes the data files to be loaded into the database;
- (e) validating that all data to be loaded into the database match the data management template by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required field, default field, sequence number, and hard-coded field checks are met;
- (f) loading the validated data into the database; and,
- (g) compiling a report identifying data that match the data management template and data that do not match the data management template.

20. (Previously presented) A method as recited in claim 19, wherein no data are loaded into the database if any of the data does not match the data management template.

21. (Previously presented) A method as recited in claim 19, wherein the user input data files are medical files.

22. (Previously presented) A method as recited in claim 19, further comprising the steps of separating data that match the data management template from data that do not match the data management template, and sending the data that do not match the data management template to the user station.

23. (Previously presented) A method as recited in claim 19, further comprising the step of sending a notification upon detecting a concurrently executing load process.

24. (Previously presented) A system for generating error and summary reports for a data load, while storing user input data files in a multi-tier client/server architecture such that the data files are organized around tiers of keywords, comprising:

- (a) logic that maintains a connection between multiple user stations and a server having a database;
- (b) logic that selects a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type, also wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database;
- (c) logic that receives from one of the user stations a plurality of user input data files that are associated to the selected plurality of keywords;

- (d) logic that selects a data management template corresponding to the keywords, wherein the data management template organizes the data files to be loaded into the database;
- (e) logic that validates that all data to be loaded into the database matches the data management template by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required field, default field, sequence number, and hard-coded field checks are met;
- (f) logic that loads the validated data into the database; and,
- (g) logic that compiles a report identifying data that match the data management template and data that do not match the data management template.

25. (Previously presented) A system as recited in claim 24, wherein no data are loaded into the database if any of the data does not match the data management template.

26. (Previously presented) A system as recited in claim 24, wherein the user input data files are medical files.

27. (Previously presented) A system as recited in claim 24, further comprising logic that separates data that match the data management template from data that do not match the data management template, and sends the data that do not match the data management template to the user station.

28. (Previously presented) A system as recited in claim 24, further comprising logic that sends a notification upon detecting a concurrently executing load process.

29. (Previously presented) A computer program embodied on a computer readable medium for generating error and summary reports for a data load, while storing user input data files in a multi-tier client/server architecture such that the data files are organized around tiers of keywords, comprising:

- (a) a code segment that maintains a connection between multiple user stations and a server having a database;
- (b) a code segment that selects a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type, also wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database;
- (c) a code segment that receives from one of the user stations a plurality of user input data files that are associated to the selected plurality of keywords;
- (d) a code segment that selects a data management template corresponding to the keywords, wherein the data management template organizes the data files to be loaded into the database;
- (e) a code segment that validates that all data to be loaded into the database matches the data management template by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required field, default field, sequence number, and hard-coded field checks are met;
- (f) a code segment that loads the validated data into the database; and,
- (g) a code segment that compiles a report identifying data that match the data management template and data that do not match the data management template.

30. (Previously presented) A computer program embodied on a computer readable medium as recited in claim 29, wherein no data are loaded into the database if any of the data does not match the data management template.

31. (Previously presented) A computer program embodied on a computer readable medium as recited in claim 29, wherein the user input data files are medical files.

32. (Previously presented) A computer program embodied on a computer readable medium as recited in claim 29, further comprising a code segment that separates data that match the data management template from data that do not match the data management template, and sends the data that do not match the data management template to the user station.

33. (Previously presented) A computer program embodied on a computer readable medium as recited in claim 29, further comprising a code segment that sends a notification upon detecting a concurrently executing load process.

(B) EVIDENCE APPENDIX

None

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(C) RELATED PROCEEDINGS APPENDIX

None